

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 2142, 2208 & 2211

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On August 9, 2023, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Debtors’ Fourth Omnibus Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts Effective as of the Rejection Date* [D.I. 2142] (the “Motion”)².

2. The Debtors received informal comments to the Motion from LexisNexis Risk Solutions and Emailage Corp. (collectively, “LexisNexis,” and together with the Debtors, the “Parties”).

3. On August 18, 2023, the Debtors filed the *Certification of Counsel* [D.I. 2208] (the “Certification of Counsel”) regarding the Motion. The Certification of Counsel noted, among other things, that the Debtors anticipated filing a stipulation to resolve the Motion as it relates to

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to them in the Motion.

LexisNexis and that, as such, the LexisNexis contracts originally listed in the proposed form of order approving the Motion were removed from the revised form of order.

4. On August 18, 2023, the Court entered the *Order Authorizing the Debtors to Reject Certain Executory Contracts Effective as of the Rejection Date* [D.I. 2211], which excluded the LexisNexis contracts.

5. The Parties hereby submit a stipulation to resolve the Motion as it relates to LexisNexis.

6. Attached hereto as **Exhibit A** is a proposed order (the “**Proposed Order**”) approving the Stipulation. Attached as **Exhibit 1** to the Proposed Order is the Stipulation. The Proposed Order has been circulated to LexisNexis, the Office of the United States Trustee (the “**U.S. Trustee**”) and the Official Committee of Unsecured Creditors appointed in these chapter 11 cases (the “**Committee**” and together with LexisNexis and the U.S. Trustee, the “**Parties**”). The Parties have no objection to the entry of the Proposed Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Proposed Order shall be uploaded to CM/ECF.

7. Accordingly, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

Dated: September 11, 2023
Wilmington, Delaware

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/s/ Kimberly A. Brown

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